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(*admitted pro hac vice*)

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**IN THE UNITED STATES DISTRICT COURT**

**FOR THE DISTRICT OF ARIZONA**

**IN RE: BARD IVC FILTER PRODUCTS  
LIABILITY LITIGATION**

**MDL No. 2:15-MD-02641-PHX-DGC**

This document relates to the cases listed on  
Exhibit A attached hereto.

**STIPULATION OF DISMISSAL WITH PREJUDICE**

COME NOW, Plaintiffs whose cases are listed on Exhibit A attached hereto ("Plaintiffs") and Defendants C.R. Bard, Inc. and Bard Peripheral Vascular, Inc. ("Defendants"), file this Stipulation of Dismissal with Prejudice, and in support thereof, respectfully show the Court as follows:

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiffs and Defendants hereby stipulate to the dismissal of the cases listed on Exhibit A with prejudice to the re-filing of same. Plaintiffs and Defendants further stipulate that they are to bear their own costs.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs and Defendants hereby respectfully request that the Court dismiss the cases listed on Exhibit A in their entirety with prejudice to the re-filing of same and order that these parties are to bear their own costs.

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Respectfully submitted this 7<sup>th</sup> day of April 2021.

Respectfully submitted,

/s/ William B. Curtis  
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**Attorneys for Defendants**

**CERTIFICATE OF SERVICE**

I hereby certify that on this 7<sup>th</sup> day of April 2021, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System which will automatically send email notification of such filing to all attorneys of record.

/s/ William Curtis  
WILLIAM CURTIS